

On 6 May 2025, the European Commission (EC) presented its much-anticipated communication on a roadmap towards ending Russian energy imports (the Roadmap). While not legally binding, the Roadmap outlines the EC's policy plans for phasing out EU energy imports from Russia. From contracts for energy to requirements for the diversification of energy sources, the Roadmap may have severe direct and indirect consequences for companies active in, or dependent on the energy sector in the EU.

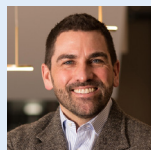
## Announced EU Plans to Phase Out Russian Energy Imports

Gas Sector Measures	Nuclear Sector Measures	Oil Sector Measures
<p><b>Transparency, Monitoring and Traceability of Russian Gas Imports</b></p> <p><b>Upcoming proposal</b> – Rules for increased transparency, monitoring and traceability of gas imports (for Russian gas, (EC) proposal by June 2025, for all gas imports, EC proposal by 2026).</p> <ul style="list-style-type: none"> <li>Requirement that companies provide information on Russian gas contracts.</li> <li>Sharing of information on relevant imports among EU and Member State authorities.</li> </ul> <p><b>Member State Level Russian Gas Phase Out Plans</b></p> <p><b>Upcoming proposal</b> – Member States to plan and monitor the phase out of Russian gas (EC proposal by June 2025).</p> <ul style="list-style-type: none"> <li>National plans to provide the volume of gas imports, a phase out timeline and options to replace Russian gas.</li> </ul> <p><b>Prohibition of Imports Under New Contracts and Existing Spot Contracts</b></p> <p><b>Upcoming proposal</b> – Banning all imports under new Russian gas contracts, and existing spot contracts by the end of 2025.</p> <ul style="list-style-type: none"> <li>Prohibition of imports under existing long-term contracts.</li> </ul> <p><b>Upcoming proposal</b> – Banning the remaining imports of Russian gas by the end of 2027.</p> <p><b>Supporting Diversification by Demand Aggregation and Better Infrastructure Use</b></p> <ul style="list-style-type: none"> <li>Discussions to continue with suppliers in the Middle East, Northern Africa, around the Black Sea and through Global Gateway.</li> <li>Developing alternatives to natural gas.</li> <li>Setting up a biogas network.</li> <li>Maximizing the use of existing infrastructure</li> </ul>	<p><b>Measures on Enriched Uranium</b></p> <p><b>Upcoming proposal</b> – EC to present trade measures on the import of enriched uranium (EC proposal by June 2025).</p> <p><b>Restriction on Contracts Co-signed by the European Atomic Energy Community (Euratom) Supply Agency</b></p> <p><b>Upcoming proposal</b> – EC to restrict supply contracts co-signed by the Euratom Supply Agency for uranium, enriched uranium and other nuclear materials (EC proposal by June 2025).</p> <p><b>Diversification Obligation and Transparency – Member State Plans to Phase Out Russian Nuclear Supplies</b></p> <p><b>Upcoming proposal</b> – EC to require that Member States develop national plans (EC proposal by June 2025).</p> <ul style="list-style-type: none"> <li>Proposal that Member States replace Russian nuclear fuels with alternatives by accelerating contracting, licensing and developing European alternatives.</li> <li>Member States to phase out reliance on Russia and increase transparency, while encouraging diversification on relevant spare parts and maintenance services.</li> </ul>	<p><b>Member State Level Plans to Phase Out Russian Oil and Ensure Alternatives</b></p> <p><b>Upcoming proposal</b> – EC to propose requiring Hungary and Slovakia to establish a plan for phasing out oil imports from Russia by the end of 2027 (EC proposal by June 2025).</p> <p><b>Continued Imposition and Enforcement of Sanctions on Entities and Vessels Suspected of Illicit Activities</b></p> <p>The EC intends to continue its work towards dialogue with concerned third countries, cooperation with partners to set stringent maritime standards, encourage improved maritime surveillance, explore the deployment of an EU common security and defense policy mission, board and inspect vessel and conclude agreements with concerned flag states.</p>

## How We Can Help

The Roadmap outlines the EC's strategy for ending EU Russian energy imports. Nevertheless, it will now have to lead to concrete legislative proposals, and EU and Member State level actions, to achieve its objectives. With developments such as new rules or contractual changes, the Roadmap may lead to complexity in the European energy sector. From the formulation of the EU's new rules to their implementation by concerned companies, we can assist you with these changes. We may for example follow the legislative processes that will now start, and help you anticipate legal changes.

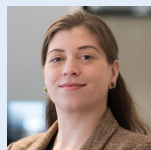
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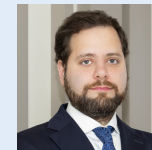
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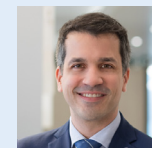
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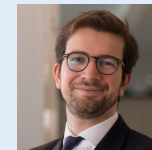
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